

Remarks

Claims 1-19 and 21-23 are pending in this application. Applicants have amended claims 1, 4-7, 9-11, 13-19, 21, and 22 to clarify the present invention. Applicants respectfully request favorable reconsideration of this application.

The Examiner objected to the drawings. Applicants submit herewith replacement drawings that illustrate the invention with improved clarity. The replacement drawings contain no new matter. Additionally, Applicants have added the legend "Prior Art" to Figs. 1 and 2. Applicants respectfully request approval of the replacement drawings and withdrawal of the objections to the drawings.

Applicants have amended claim 11 to correct the typographical error noted by the Examiner. Accordingly, Applicants respectfully request withdrawal of the objection to claim 11.

The Examiner rejected claims 1-19 and 21-23 under 35 U.S.C. § 112, second paragraph, as indefinite. Applicants have amended the claims to recite patentable features with improved clarity and to ensure antecedent basis exists for all terms. Applicants submit that all pending claims comply with 35 U.S.C. § 112, second paragraph, and respectfully request withdrawal of this rejection.

The Examiner rejected claims 14-18 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants submit that claims 14-18 are not directed to software per se.

For example, claim 14 recites a visualization module. This could include any number of physical devices for visualizing the strip. Accordingly, claims 14-18 recite statutory subject matter and Applicants respectfully request withdrawal of this rejection.

The Examiner rejected claims 14-19, 21, and 22 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants submit that the claims directed to a signal. As discussed above, claims 14-18 recite a visualization module. Additionally, claim 19 recites a computer readable medium. Accordingly, claims 14-19, 21, and 22 recite statutory subject matter and Applicants respectfully request withdrawal of this rejection.

The Examiner rejected claims 1-4, 7-9, 12-16, 18, and 19 under 35 U.S.C. § 103(a) as being unpatentable over 5,535,129 to Keijser in view of U.S. patent 4,736,305 to Watanabe. The Examiner rejected claims 5 and 10 under 35 U.S.C. § 103(a) as being unpatentable over Keijser in view of Watanabe and further in view of U.S. patent 6,411,862 to Hazama et al. The Examiner rejected claims 6 and 23 under 35 U.S.C. § 103(a) as being unpatentable over Keijser in view of Watanabe and further in view of U.S. patent 4,551,805 to Shimoda et al. The Examiner rejected claim 11 under 35 U.S.C. § 103(a) as being unpatentable over Keijser in view of Watanabe and further in view of U.S. patent 5,287,433 to Prunotto et al. The Examiner rejected claims 21 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Keijser in view of Watanabe and further in view of U.S. patent 6,463,352 to Tadokoro et al.

The combination of Keijser and Watanabe does not suggest the invention recited in claims 1-4, 7-9, 12-16, 18, and 19 since, among other things, the combination does not suggest

visualizing the strip. Contrary to the Examiner's assertion, Keijser does not suggest obtaining a visual image of a strip. The figure of Keijser is a flowchart illustrating elements of the method suggested by Keijser. None of the steps in the flowchart include visualizing the sheet.

Additionally, Keijser does not suggest a camera, sensor or any other means for visualizing the sheet or any description of a visualization. On the other hand, Fig. 1 of Watanabe is described as a schematic cross-sectional view of a sheet. Watanabe does not suggest visualizing the sheet.

Watanabe also does not suggest a camera, sensor or any other means for visualizing the sheet.

Claim 1 clearly recites that the visualization of the strip is related to the other elements of the method recited therein. It would not have been obvious to visualize a strip or compare the visualization to a reference since neither Keijser nor Watanabe suggests visualization and subsequent use of the visualization. Accordingly, the combination of Keijser and Watanabe does not suggest the invention recited in claims 1-4, 7-9, 12-16, 18, and 19 and Applicants respectfully request withdrawal of this rejection.

The combination of Keijser, Watanabe and Hazama et al. does not suggest the invention recited in claims 5 and 10 since, among other things, the combination does not suggest a method or device for optimizing measurement and control of the flatness of a strip of rolled material.

Hazama et al. only suggests displaying a model of an object to be produced. Hazama et al. does not suggest visualizing a strip, determining a relevant flatness fault type by comparing the visualization to one or more reference strip models, or fusion or morphing the visualization with measured data. On the other hand, Keijser and Watanabe do not suggest any visualization or utilizing visualization data as recited in claim 1. Therefore, not only does not combination of Keijser, Watanabe and Hazama et al. not suggest the present invention, but it would also not be

obvious to combine the references as suggested by the Examiner since, for example, Keijser and Watanabe do not suggest any visualization or utilizing visualization data. Therefore, the combination of Keijser, Watanabe and Hazama et al. does not suggest the invention recited in claims 5 and 10 and Applicants respectfully request withdrawal of this rejection.

The combination of Keijser, Watanabe and Shimoda et al. does not suggest the invention recited in claims 6 and 23 since, among other things, none of Keijser, Watanabe or Shimoda et al. suggests visualizing the strip. Claim 1, from which claims 6 and 23 depend, clearly recites visualization of the strip and relating the visualization to the other elements of the method recited therein. It would not have been obvious to visualize a strip or compare the visualization to a reference since none of Keijser, Watanabe or Shimoda et al. suggests visualization of a strip and subsequent use of the visualization. Accordingly, the combination of Keijser, Watanabe and Shimoda et al. does not suggest the invention recited in claims 6 and 23 and Applicants respectfully request withdrawal of this rejection.

The combination of Keijser, Watanabe and Prunotto et al. does not suggest the invention recited in claim 11 since, among other things, none of Keijser, Watanabe or Prunotto et al. suggests visualizing the strip. Claim 1, from which claim 11 depends, clearly recites visualization of the strip and relating the visualization to the other elements of the method recited therein. The video suggested by Prunotto et al. is not a visualization of the strip and is not utilized as recited in claim 1. It would not have been obvious to visualize a strip or compare the visualization to a reference since none of Keijser, Watanabe or Prunotto et al. suggests visualization of a strip and subsequent use of the visualization. Accordingly, the combination of

Keijser, Watanabe and Prunotto et al. does not suggest the invention recited in claim 11 and Applicants respectfully request withdrawal of this rejection.

The combination of Keijser, Watanabe and Tadokoro et al. does not suggest the invention recited in claims 21 and 22 since, among other things, none of Keijser, Watanabe or Tadokoro et al. suggests visualizing the strip. Claim 19, from which claims 21 and 22 depend, clearly recites visualization of the strip and relating the visualization to the other elements of the method recited therein. Tadokoro et al. only suggests transmitting data. It would not have been obvious to visualize a strip or compare the visualization to a reference since none of Keijser, Watanabe or Tadokoro et al. suggests visualization of a strip and subsequent use of the visualization. Accordingly, the combination of Keijser, Watanabe and Tadokoro et al. does not suggest the invention recited in claims 21 and 22 and Applicants respectfully request withdrawal of this rejection.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date: September 2, 2008

/Eric J. Franklin/
Eric J. Franklin, Reg. No. 37,134
Attorney for Applicants
Venable LLP
575 Seventh Street, NW
Washington, DC 20004
Telephone: 202-344-4936
Facsimile: 202-344-8300